



ENZYMATIC THERAPY

What **Better** feels like.™

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY™

&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

2713 5 JUL 25 P2:16

June 8, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

JUL 18 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	Levels of HDL2 (best cholesterol) rose up to 21%.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (L-Selenomethionine), L-Arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/8/05

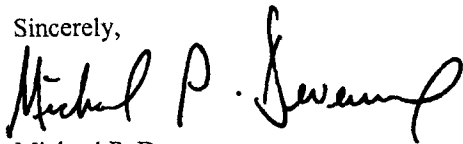
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16398

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Devereux
Chief Financial Officer



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June 11, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	An HDL reading above 60 is now recognized as having a positive impact on heart health.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (L-Selenomethionine), L-Arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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Robert Doster

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Date: 6/11/05

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June 12, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	Reduces C-reactive protein levels, an important indicator for heart health.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (L-Selenomethionine), L-Arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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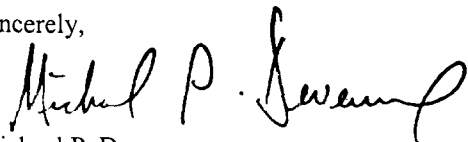
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Title: Senior Vice President of Scientific Affairs

Date: 6/12/05

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	Niacin aids in fat and cholesterol metabolism, which supports healthy blood circulation.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (L-Selenomethionine), L-Arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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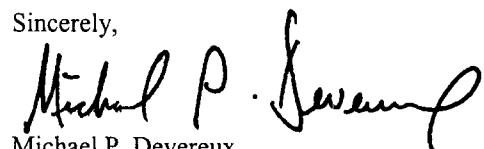
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	Allows you to be proactive in your effort to improve good cholesterol levels and heart health.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (L-Selenomethionine), L-Arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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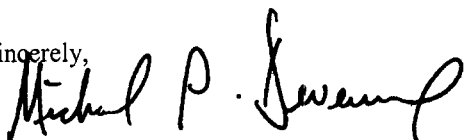
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